

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

2019 JAN -8 A 9 20

CLERK OF DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA

v.

CARLOS MARIO MEJIA LOPEZ,

Defendant.

Criminal No. 1:16-CR-256

JOINT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER

The United States of America, by and through G. Zachary Terwilliger, United States Attorney, Lena Munasifi, Special Assistant United States Attorney (LT), and the defendant, by his undersigned counsel, respectfully move this Honorable Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). In support thereof, the parties states as follows:

1. During the course of the investigation, the United States has gathered or generated electronic records, which contain confidential information for co-conspirators under investigation and non-parties in this case. These electronic records include, but are not limited to electronic communications, FBI reports, and video and audio recordings. The United States intends to produce these electronic records, and a comprehensive discovery compilation in one (1) DVD labeled, "Government's Discovery Production 1:16-cr-256, 1:17-cr-83, Production 1," in accordance with the Federal Rules of Criminal Procedure, relevant case law.
2. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of the one (1) DVD obtained through discovery

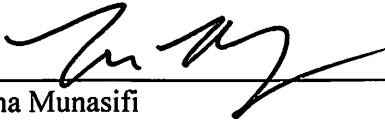
(collectively “the electronic records”). In sum, the proposed Protective Order prohibits the dissemination of the one (1) DVD and the information contained therein to third parties not specified in the order, and restricts the dissemination to the defendant.

3. Counsel for the defendant has reviewed this Motion and the Protective Order, and has agreed to its terms.

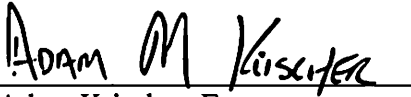
WHEREFORE, the undersigned respectfully request that the Court enter the proposed Protective Order.

Respectfully Submitted,

G. Zachary Terwilliger
United States Attorney

By: 
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SEEN AND AGREED:


Adam Krischer, Esq.
Counsel for defendant Carlos Mario Mejia Lopez